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February 13, 2019

SUBMITTED BY ECF AND FACSIMILE

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007
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Re: *Thor 680 Madison Ave LLC v. Qatar Luxury Group S.P.C., et al.*, 1:17-cv-08528 U.S.D.C., Southern District of New York (Foley Square)

Dear Judge Gardephe:

On behalf of Defendant Qatar Luxury Group S.P.C. ("QLG"), we write pursuant to Section I.D. of Your Honor's Individual Rules of Practice to request the extension of deadlines in this case.

1. The deadline(s) sought to be extended. QLG seeks to extend all the remaining discovery deadlines.

2. The length of time requested for the extension. QLG seeks a 7-day extension for all remaining discovery deadlines. The dates would change as follows, adjusted for those dates that would fall on weekends or holidays:

Event	Date in November 20, 2018 Stipulation (Docket #44)	Requested Date
Complete fact discovery	March 18, 2019	March 25, 2019
Complete depositions of fact witnesses	March 18, 2019	March 25, 2019
Complete expert discovery	April 12, 2019	April 19, 2019
Party-proponent expert disclosures	March 11, 2019	March 18, 2019

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Party-opponent expert disclosures	March 25, 2019	April 1, 2019
Post-discovery dispositive motion letter	April 1, 2019	April 8, 2019
Opposition to post-discovery dispositive motion letter	April 8, 2019	April 15, 2019

3. The number of previous requests. The parties jointly stipulated to a 30-day extension for all remaining discovery deadlines on September 24, 2018 (Docket #34), and another 30-day extension for all remaining discovery deadlines on November 20, 2018. (Docket #44.)

4. The reason for the current request. The parties have diligently engaged in discovery, but have been unable to find a mutually agreeable date for the depositions of Plaintiff's 30(b)(6) representatives prior to the March 18, 2019 fact discovery deadline. If granted, the depositions would be held on March 19 and March 20, 2019.

5. Whether the adversary consents. Plaintiff does not oppose this extension.

Dated: February 13, 2019

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

/s/ Aneca E. Lasley

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*Attorneys for Defendant Qatar Luxury Group,
S.P.C.*

cc: All counsel of record via ECF notice